

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Kevin Wheeler and Julieanne Wheeler,)
)
)
Plaintiff,)
) Case No. 20-cv-3694
v.)
) Hon. John Robert Blakey
Selene Finance LP,)
)
)
Defendant.)

OFFER OF JUDGMENT

To: Mohammed O. Badwan
SULAIMAN LAW GROUP, LTD.
2500 South Highland Avenue, Suite 200
Lombard, Illinois 60148
mbadwan@sulaimanlaw.com

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant, Selene Finance LP (“Defendant”), hereby offers to allow judgment to be entered against it in this action for:

1. All damages as asserted in Plaintiff’s Complaint in the amount of maximum statutory damages of \$5,000.00 (Count I - \$1,000.00; Count II - \$4000.00); actual and other damages in the amount of \$100.00; and
2. Reasonable attorneys’ fees, litigation expenses and costs of suit incurred by Plaintiff in relation to the claims against Defendant, solely as permitted by statute, in an amount to be determined by the Court or as agreed to by the parties.
3. This offer of judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and shall not be construed as either an admission that Defendant is liable in this action or that Plaintiff has suffered any damage. This offer of judgment is intended to resolve all of Plaintiff’s claims in this action, including, without limitation, any and all claims for actual and/or compensatory damages, statutory damages, punitive damages, treble damages, attorneys’ fees,

litigation expenses and costs of suit. This offer of judgment shall not be filed with the Court unless a) acceptance or b) in a proceeding to determine the reasonableness hereof. To accept this offer of judgment Plaintiff must notify counsel for Defendants of acceptance, in writing, within 14 days of service of this offer of judgment.

DATED: September 10, 2020 Respectfully submitted,

Selene Finance LP

By: /s/ Jonathan D. Nusgart.

Jonathan D. Nusgart
Smith & Weik, LLC
1011 Lake St., Suite 412
Oak Park, IL 60301
(708) 386-9540

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2020, I emailed the above Offer of Judgment to counsel for Plaintiff, at the email addresses listed above.

By: /s/ Jonathan D. Nusgart.